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Conservation Groups also expect to call the following fact witnesses and/or witnesses disclosed pursuant to Rules 26(a)(1) and 26(a)(2)(B) of the Federal Rules of Civil Procedure:

6. **Anthony Dolle²**

Member and Board President, Tennessee Clean Water Network

625 Market St., Knoxville, TN 37902

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Telephone: (865) 522-7007

² The address, e-mail and/or telephone number for Conservation Groups' members are provided for the respective organizations.

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7. **Michelle Haynes** (Tennessee Clean Water Network)*
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8. **Jessica Becket**
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11. **James Woodall**
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12. Representatives from the Tennessee Department of Environment and Conservation involved in permitting and compliance activities at Gallatin Fossil Plant, including:

- a. **Vojin Janjić**
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- b. **Britton Dotson**
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c. Chuck Head

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Pursuant to Fed. R. Civ. P. 26(a)(3)(A), Conservation Groups identify the following witnesses it may call if the need arises:

13. Frank Fiss

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14. Alan Sparkman

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15. Dr. Craig E. Philip

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16. Jovian Sackett

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17. Any individual appearing on TVA's witness lists.
18. To the extent that TVA refuses to stipulate to the admissibility of a document, Conservation Groups reserve the right to call any officer, employee, or consultant of TVA, the State of Tennessee, or the Southern Environmental Law Center to establish admissibility.
19. Any individuals who may be needed for impeachment or rebuttal purposes.

Respectfully submitted,

s/ Elizabeth A. Alexander

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Witness List was filed electronically on December 23, 2016, through the Court's Electronic Filing System. Parties may access this filing through the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to the following parties indicated on the electronic filing receipt:

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